

March 6, 2014

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 2-25554

**Re: Expression of Interest for Randolph Telephone Membership Corporation
WC Docket No. 10-90**

Dear Sir or Madam:

This letter is sent as an expression of interest by Randolph Telephone Membership Corporation (Randolph) in applying for a grant as a Rural Broadband Experiment as provided in WC Docket No. 10-90.

DESCRIPTION OF RANDOLPH AS SUBMITTING ENTITY

Randolph was formed on May 13, 1954. Beginning with 97 telephones in Farmer, NC in 1957, Randolph currently serves over 10,000 customers in eight communities, which are dispersed over the rural areas of seven North Carolina Counties. The company currently operates as an Incumbent Local Exchange Carrier (ILEC) and, along with its subsidiaries, provides a full array of state of the art services including local and long distance voice service, broadband Internet, IPTV, wireless, business systems, camera surveillance and computer services. If necessary, Randolph can operate as a Competitive Local Exchange Carrier (CLEC) in any expanded service area.¹ Randolph prides itself on its commitment to its local communities and maintains full service local offices in Asheboro and Liberty, N.C.

PROPOSED SERVICE AREA FOR EXPERIMENT

For purposes of this experiment, Randolph is requesting funds for a project to be built and operated in some of the most rural areas of Chatham County—covering approximately 72 square miles. Randolph currently provides services in other parts of rural Chatham County and the areas designated for the experiment is located in close proximity to Randolph's current service areas in Chatham County. The areas proposed for service do not currently have access to broadband service. With appropriate funding assistance, Randolph plans to bring broadband and other related services to the homes, businesses and anchor institutions of these underserved areas of Chatham County.

¹ In North Carolina, CLECs are called Competing Local Providers (CLPs).

The exact areas include the census blocks identified in Attachment A. This area is generally rural and economically depressed. Included in this path is a number of anchor institutions, comprising Chatham Central High School, Bear Creek; JS Waters Elementary School, Goldston; Bonlee Elementary School, Bonlee; Goldston Public Library, Goldston; Goldston Town Hall; Goldston; Chatham Sheriff Sub-Station; Goldston Volunteer Fire Department; Bonlee Volunteer Fire Department; Bennett Sub-Station, Station 15; and First Health EMS. Randolph plans to offer this area a full complement of services, including broadband with minimum speeds of three megabytes, voice and video. The following data provides demographic information about the potential customers to be served:

	Median Household Income	Population
Census Tract 205	\$57,793 (2012) \$36,111 (2000)	4,307 (2012)
Block 1	\$35,978 (2000)	4,307 (2010)
Block 2	\$37,130 (2000)	1,492 (2010)
Block 3	\$32,778 (2000)	1,204 (2010)

	Median Household Income	Population
Census Tract 206	\$48,224 (2012) \$40,491 (2000)	5156 (2012)
Block 1	\$46,786 (2000)	1303 (2010)
Block 2	\$41,938 (2000)	2156 (2010)
Block 3	\$36,923 (2000)	1191 (2010)
Block 4	\$36,250 (2000)	701 (2010)

TECHNOLOGY TO BE DEPLOYED

Randolph plans to utilize Internet Protocol (IP) technology utilizing packet switched connections to exchange all forms of communications and information. The experiment will also deploy Fiber to the Home for all services. By deploying fiber to the home, customers will receive numerous benefits including more bandwidth— capability to transport virtually unlimited bandwidth; greater reliability—less susceptible to glitches; future flexibility—can offer an array of services; as well as cost efficiency—fiber is more durable for less maintenance. Fiber to the Home will accommodate today's demand for high-speed Internet connections as well as advanced applications in the future. Randolph will offer residents in these unserved areas voice, high-speed Internet and IPTV with speeds up to 50 Mbps.

GOVERNMENT PARTICIPATION

Although it is not contemplated that any governmental entity will be involved in the direct delivery of services, this Expression of Interest results from direct requests and inquiries from Officials in Chatham County asking Randolph to provide these expanded services to these underserved areas of Chatham County. Chatham County has diverse demographics. Part of the county is located near Orange County, N.C., in close proximity to Chapel Hill, N.C. Pittsboro, the county seat of Chatham County, is a growing area that is quickly becoming a part of the more populated Research Triangle area. Unfortunately, the areas proposed for the experiment by Randolph are located in the most rural, low income areas of Chatham County. These areas do not have the same availability of services as the other areas of Chatham County, and it is for this reason that Chatham County officials have approached Randolph about providing such services. However, until the Commission opened this docket, the opportunity was just not feasible.

State and Local governmental officials support this effort. Individual Supporting officials include: Walter Petty, Chairman – Chatham County Board of Commissioners; Charlie Horn, Chatham County Manager; Tim Cunnup, Goldston Mayor; and Dianne Reid, Executive Director, Chatham County Economic Development Corporation. Congresswoman Ellmers supports Randolph Telephone's efforts and has included a letter of support in Attachment B.

ESTIMATED FUNDING REQUIREMENT

Randolph estimates that a one-time grant of \$5.5 million would be sufficient to enable it to provide the described services in the experimental area of Chatham County.

Lastly, Randolph thanks the Commission for the opportunity to express its interest in applying for a Rural Broadband Experiment. Randolph looks forward to the next stages of its proposal and to serving areas of Chatham County, NC, that have patiently been waiting for broadband services and more.

Sincerely,


Frankie L. Cagle,
General Manager

ATTACHMENTS

COUNSEL TO RANDOLPH:
Allen Law Offices, PLLC
1514 Glenwood Ave., Suite 200
Raleigh, NC 27608

ATTACHMENT A

State	County	Tract	Block		State	County	Tract	Block		State	County	Tract	Block
37	037	205.00	1019		37	037	205.00	2052		37	037	206.00	3074
37	037	205.00	1020		37	037	205.00	2054		37	037	206.00	3075
37	037	205.00	1021		37	037	205.00	2055		37	037	206.00	3076
37	037	205.00	1022		37	037	205.00	2056		37	037	206.00	3077
37	037	205.00	1023		37	037	205.00	2057		37	037	206.00	3079
37	037	205.00	1026		37	037	205.00	2058		37	037	206.00	3080
37	037	205.00	1027		37	037	205.00	2059		37	037	206.00	3081
37	037	205.00	1029		37	037	205.00	2060		37	037	206.00	3083
37	037	205.00	1030		37	037	205.00	2061		37	037	206.00	4000
37	037	205.00	1034		37	037	205.00	2062		37	037	206.00	4001
37	037	205.00	1037		37	037	205.00	2063		37	037	206.00	4002
37	037	205.00	2000		37	037	205.00	2064		37	037	206.00	4003
37	037	205.00	2001		37	037	205.00	2065		37	037	206.00	4004
37	037	205.00	2002		37	037	205.00	2066		37	037	206.00	4008
37	037	205.00	2004		37	037	205.00	2067		37	037	206.00	4009
37	037	205.00	2009		37	037	205.00	2069		37	037	206.00	4010
37	037	205.00	2010		37	037	205.00	3000		37	037	206.00	4012
37	037	205.00	2011		37	037	205.00	3001		37	037	206.00	4013
37	037	205.00	2012		37	037	205.00	3014		37	037	206.00	4014
37	037	205.00	2014		37	037	205.00	3016		37	037	206.00	4015
37	037	205.00	2015		37	037	206.00	1002		37	037	206.00	4016
37	037	205.00	2016		37	037	206.00	1006		37	037	206.00	4017
37	037	205.00	2019		37	037	206.00	1010		37	037	206.00	4019
37	037	205.00	2020		37	037	206.00	1017		37	037	206.00	4020
37	037	205.00	2021		37	037	206.00	1018		37	037	206.00	4021
37	037	205.00	2022		37	037	206.00	1022		37	037	206.00	4022
37	037	205.00	2023		37	037	206.00	1024		37	037	206.00	4023
37	037	205.00	2024		37	037	206.00	1025		37	037	206.00	4024
37	037	205.00	2025		37	037	206.00	1026		37	037	206.00	4026
37	037	205.00	2026		37	037	206.00	1027		37	037	206.00	4027
37	037	205.00	2027		37	037	206.00	1029		37	037	206.00	4028
37	037	205.00	2028		37	037	206.00	1031		37	037	206.00	4029
37	037	205.00	2029		37	037	206.00	1032		37	037	206.00	4030
37	037	205.00	2031		37	037	206.00	1034		37	037	206.00	4031
37	037	205.00	2033		37	037	206.00	1042		37	037	206.00	4032
37	037	205.00	2034		37	037	206.00	3006		37	037	206.00	4033
37	037	205.00	2035		37	037	206.00	3007		37	037	206.00	4034
37	037	205.00	2036		37	037	206.00	3008		37	037	206.00	4035
37	037	205.00	2037		37	037	206.00	3011		37	037	206.00	4036
37	037	205.00	2038		37	037	206.00	3012		37	037	206.00	4037
37	037	205.00	2039		37	037	206.00	3019		37	037	206.00	4038
37	037	205.00	2040		37	037	206.00	3022		37	037	206.00	4039
37	037	205.00	2041		37	037	206.00	3024		37	037	206.00	4040
37	037	205.00	2042		37	037	206.00	3025		37	037	206.00	4041
37	037	205.00	2043		37	037	206.00	3026		37	037	206.00	4042
37	037	205.00	2044		37	037	206.00	3027		37	037	206.00	4043
37	037	205.00	2045		37	037	206.00	3028		37	037	206.00	4044
37	037	205.00	2046		37	037	206.00	3029		37	037	206.00	4046
37	037	205.00	2048		37	037	206.00	3030		37	037	206.00	4047
37	037	205.00	2049		37	037	206.00	3068		37	037	206.00	4048
37	037	205.00	2050		37	037	206.00	3069		37	037	206.00	4049
37	037	205.00	2051		37	037	206.00	3070					

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CONGRESSWOMAN ELLMER

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ENERGY AND COMMERCE
SUBCOMMITTEE ON
COMMUNICATIONS AND TECHNOLOGY
SUBCOMMITTEE ON
HEALTH
SUBCOMMITTEE ON
OVERSIGHT AND INVESTIGATIONS

Congress of the United States
House of Representatives
Washington, DC 20515-3302

February 26, 2014

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 2-25554

Dear Sir or Madam:

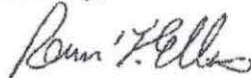
On February 7, 2014 the FCC announced that it has identified potential areas for rural broadband experiments for the Connect America Fund. The FCC emphasized it wanted to concentrate on areas that do not have access to fixed broadband at 3 Mbps download/768 kbps upload speeds.

For months now I have been hearing from families with children in Chatham County, North Carolina, who complain they have no access to broadband. The parents are concerned that their children are being left behind as they cannot use technology to study and learn like most other children in the country. I would like to urge the FCC to provide initial rounds of funding to areas that have no broadband service. It is inequitable to use Connect America Fund subsidies to increase or enhance services already provided in an area while there are still homes with no service.

If we can focus evaluation of grant requests on those who would offer services to homes without current service, I am cautiously optimistic that at last these Chatham County families may have access to technology. But I would like to urge the FCC to monitor and oversee these grants to make sure they build out the areas indicated in the grant applications. Also, I was pleased to note that there will be a public challenge process to ensure that subsidies are awarded to support areas that are in fact underserved. The communities and homes that are left out should have the ability to protest and demand that grant funds be prioritized to encourage deployment to areas without service.

Finally, I want to note that the President has announced his intention to unilaterally expand and reprogram the Connect America Fund, without Congressional input, including increasing the assessments on the phone bills of American rate payers. As Congress is moving toward consideration of a comprehensive rewrite of legislation governing the communications industry, I will be working to make sure that any reforms to the Rural Service Fund focus on getting broadband service to everyone before upgrading and expanding service to those who already have it.

Sincerely,



Renee Ellmers
Member of Congress

RLE:caw